

United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA)

V.)

Jose Luis RAMON-Esquivel) Case Number:

Jose Adolfo ESQUIVEL)

Alejandro LOPEZ Jr)

Abrahan DE LA CRUZ-Paau)

)

)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 23, 2019 in the county of Webb in the
 (Date)
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

Title 8 United States Code, Section
 1324

Knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States, by means of transportation and otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A".



Continued on the attached sheet.

/s/ David Robert

Complainant's Signature

David Robert, Special Agent

Printed Name and Title

Sworn to before me and signed in my presence,

Date: December 26, 2019

Judge's Signature

City and State: Laredo, Texas**Sam Sheldon, U.S. Magistrate Judge**

Printed Name and Title

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[CONT OF BASIS OF COMPLAINT]

1. On December 23, 2019, Homeland Security Investigations (HSI) special agents (SAs) conducted a joint operation with the Laredo Police Department (LPD) and Border Patrol Agents (BPAs) on Jef Drive, Laredo, Texas and the surrounding area. HSI Laredo received information concerning an alien smuggling attempt taking place in the area and conducted joint surveillance with the above agencies.
2. At approximately 1820 hours, law enforcement observed a white Chevrolet Silverado turn onto Jef Drive and drive to the dirt lot at the end of the street just across from a parked tractor/trailer. The Chevrolet Silverado was previously identified by HSI surveillance as belonging to an alien smuggling coordinator. Two unknown males exited the Chevrolet Silverado and met with the operator of the tractor/trailer. The two males then departed the area in the Chevrolet Silverado. Approximately one hour later, the white Chevrolet Silverado returned to the area and parked across from the parked tractor/ trailer. The two males exited the Chevrolet Silverado and communicated with the operator of the tractor/ trailer. Both males periodically used their cell phones. Both males appeared to be scanning the area for law enforcement.
3. As the two males were in the area meeting with the operator, a gray Ford Freestar entered the area and drove to the rear of the tractor trailer. An unknown number of persons exited the Ford Freestar and were loaded into the trailer. The Ford Freestar left the area and law enforcement conducted continuous mobile surveillance on the Ford Freestar and maintained surveillance on Jef Drive. Law enforcement conducted a vehicle stop on the Ford Freestar and identified Alejandro LOPEZ Jr as the driver. LOPEZ Jr was detained and transported to Laredo South Border Patrol Station.
4. Approximately ten minutes after the Ford Freestar exited the area, a silver Pontiac G6 entered the area and drove to the rear of the tractor trailer. An unknown number of persons exited the Pontiac G6 and were loaded into the trailer. The Pontiac G6 left the area and law enforcement conducted continuous mobile surveillance on the Pontiac G6 and maintained surveillance on Jef Drive. Law enforcement conducted a vehicle stop on the Pontiac G6 and identified Abrahan DE LA CRUZ-Paau as the driver. DE LA CRUZ-Paau was advised of his Miranda warnings at the scene to which he declined to speak to law enforcement without an attorney present. DE LA CRUZ-Paau was detained and transported to Laredo South Border Patrol Station.
5. Approximately ten minutes after the Pontiac G6 left the area, the two males got into the Chevrolet Silverado and exited Jef Drive. Law enforcement simultaneously conducted a vehicle stop on the Chevrolet Silverado and approached the tractor trailer. Jose Luis RAMON-Esquivel was identified as the driver of the Chevrolet Silverado and Jose Adolfo ESQUIVEL as the passenger. Both individuals were detained and transported to Laredo South Border Patrol Station. Jose Luis RAMON-Esquivel was identified through previous HSI surveillance as the alien smuggling coordinator.
6. Law enforcement apprehended nine (9) individuals in the trailer. Immigration inspections of all nine (9) subjects revealed they were illegally present in the United States. All nine (9) subjects were detained and transported to Laredo South Border Patrol Station.

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7. During a post-Miranda interview, LOPEZ Jr. stated he was recruited by unknown person through cell phone to transport undocumented aliens (UDAs). LOPEZ Jr. stated he agreed to transport UDAs for one hundred dollars (\$100) per person. LOPEZ Jr. declined to answer how many UDAs he transported on this date. LOPEZ Jr. stated he picked up the UDAs at a house and transported them to a street off of Killam Industrial road, near Mines Road.

8. During a post-Miranda interview, RAMON-Esquivel stated he is illegally present in the United States but has lived in Laredo for approximately eighteen (18) years. RAMON-Esquivel stated he was sent an address and told to wait there by a friend. RAMON-Esquivel stated he went with his cousin, Jose Adolfo ESQUIVEL to the address at the end of Jef Drive. RAMON-Esquivel stated he was going to help his friend but did not know what for. RAMON-Esquivel reported to HSI SAs he observed UDAs load into a trailer but denied any involvement in alien smuggling.

9. During a post-Miranda interview, ESQUIVEL stated he was picked up from work by his cousin, Jose Luis RAMON-Esquivel and went to a gas station approximately two (2) miles away. ESQUIVEL stated it took him and RAMON-Esquivel one-hour to travel two (2) miles because his cousin and he were smoking. ESQUIVEL stated he does not remember being on Jef Drive near a tractor/ trailer being loaded with UDAs during that one-hour time period. ESQUIVEL gave verbal consent to a search of his cellular phone. A search of the phone yielded multiple messages indicating alien smuggling on various dates.

10. Angel MONDRAGON-Alvarado and Zaith PENALOZA-Lopez were held as material witnesses to the human smuggling event.

11. Material witness MONDRAGON-Alvarado stated he is a Mexican national with no documents to enter or remain in the United States legally. MONDRAGON-Alvarado stated his family made arrangements with members of a human smuggling organization (HSO) to be smuggled to North Carolina for an unknown amount of money. MONDRAGON-Alvarado stated he left his hometown and travelled to Nuevo Laredo, Tamaulipas, Mexico. MONDRAGON-Alvarado stated he was smuggled across the Rio Grande River by wading along with six (6) other individuals and one (1) guide. MONDRAGON-Alvarado stated he got into a truck driven by an unknown individual and taken to a stash house. MONDRAGON-Alvarado stated on December 23, 2019, he was transported in a silver sedan driven by a male wearing a blue or green shirt. MONDRAGON-Alvarado stated he sat behind the driver seat of the vehicle. The description provided matched Abrahan DE LA CRUZ-Paau.

12. Material witness PENALOZA-Lopez stated he is a Mexican national with no documents to enter or remain in the United States legally. PENALOZA-Lopez stated he made arrangements with members of an HSO to be smuggled to Los Angeles, California for approximately eight thousand five hundred dollars (\$8500) of which he has paid approximately three thousand five hundred (\$3500) of the smuggling fee. PENALOZA-Lopez stated he was smuggled across the Rio Grande River by wading the river with six (6) individuals and one (1) guide. PENALOZA-Lopez stated he was instructed to load into a vehicle by an unknown individual and taken to a stash house. VAZQUEZ-Cortes stated on December 23, 2019, he was transported in a van with sliding doors. The description of the vehicle matches the Ford Freestar driven by Alejandro LOPEZ Jr.

[END]